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March 12, 2024

**VIA ECF**

Honorable Rukhsanah L. Singh, U.S.M.J  
United States District Court  
Clarkson S. Fisher Building & US Courthouse  
402 East State Street  
Trenton, NJ 08608

**Re: *In re: Johnson & Johnson Talcum Powder Products, Marketing, Sales Practices, and Products Liability Litigation***  
**Case No.: 3:16-md-02738-MAS-RLS**

Dear Judge Singh:

The Plaintiffs' Steering Committee is in receipt of Defendant's March 6<sup>th</sup> Letter (ECF No. 29283), and the Court's Text Order asking for a response by tomorrow, March 13<sup>th</sup> (ECF No. 29284).

As an initial matter, prior to filing their letter, Defendants did not meet and confer with the PSC, so that we could attempt to informally address certain issues before raising these issues with the Court. The PSC was not aware of the complete list of cases included on Exhibit A and B, or all the categories of issues identified by Defendants in their letter.

The PSC is currently reviewing the letter and the accompanying Exhibits. A request was made of Defendants to provide a list of firms associated with the cases on the Exhibits. The Exhibits only list the case name and number, but not the associated law firm, which limits the PSC's ability to quickly analyze and review. As of today, Defendants responded that they "didn't organize [their] charts that way and so [they] would have to go back and look each one up again" and refused to provide a list of firms associated with the cases.

In order to review each case on the Exhibits, properly evaluate Defendants' letter, and reach out to all affected firms, the PSC requests an additional 10 days to respond.

During this time, we will continue to meet and confer with Defendants on the cases listed on the Exhibits.

The PSC recognizes that timely substitution needs to be accomplished in any cases in which plaintiffs have passed away, but the PSC needs additional time to meet and confer with Defendants, review the cases listed on the Exhibits, and reach out to the firms with cases on the list to obtain information necessary to provide a fulsome response to the Court.

The PSC also notes that the Defendants make no mention of the numerous plaintiffs in the MDL who were able to file amended complaints substituting parties by the February 28<sup>th</sup> deadline.

We respectfully request that the Court provide the PSC with an additional 10 days to provide a more fulsome response.

Respectfully submitted,

s/ P. Leigh O'Dell  
P. Leigh O'Dell

s/ Michelle A. Parfitt  
Michelle A. Parfitt

Plaintiffs' Co-Lead Counsel

cc: Susan Sharko, Esq. (via email)  
All Counsel (via ECF)